

## **REMARK**

Applicant respectfully requests reconsideration of this application as amended. Claims 1-2 have been amended; No Claims have been cancelled; Therefore, claims 1-5 are now presented for examination.

### **U.S.C. §103(a) Rejections**

Claims 1 and 5 have been rejected under 35 U.S.C. §102(b) as being anticipated by or, in the alternative, under 35 U.S.C. 103(a) as obvious over Deck (U.S. Patent No. 4,864,515). Claims 2-4 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Deck (U.S. Patent No. 4,864,515) in view of Gordon et al. (U.S. Patent 3,833,903). Applicant disagrees.

Claims 1-5 require, in part, "a first sample-and-hold amplifier coupled to said photocell and adapted to store a first analog signal of the series of analog signals; a second sample-and-hold amplifier coupled to the first sample-and-hold amplifier and adapted to store the first analog signal when the first sample-and-hold amplifier stores a second analog signal of the series of analog signals; a differential amplifier coupled to the first and second sample-and-hold amplifiers generating an analog difference of the first analog signal and the second analog signal." The claimed invention is concerned with capturing incident light by a series of analog signals. Each of the analog signals in the series is compared with the next analog signal in the series and an analog difference is generated and then converted to a digital signal that can be stored.

In contrast, Deck captures an analog signal at a given instance on a plane by combining two components of the plane, the U and V portions, and then converting that captured analog signal to digital logic so it can later be analyzed. (Col. 3, lines 8-36) Deck does not teach or suggest comparing analog signals in a series of analog signals representing incident light and obtaining differences that are later converted to digital and stored. The claimed invention and specification goes into great detail about the benefits of doing the comparison before converting to digital including reduced costs and increased accuracy in the differences obtained because the differences are taken before being converted to digital where losses are always experienced. As Deck does not teach each of the elements required by the claimed invention, the rejection of Claims 1 and 5 should be withdrawn.

Similarly, Gordon fails to address the claimed elements as discussed above. Particularly, Gordon fails to disclose a first and second sample and hold amplifier for holding a first and second analog signal in a series of analog signals and a differential amplifier coupled to the first and second sample-and-hold amplifiers generating an analog difference of the first and second analog signals. Accordingly, the rejections to claims 2-4 should be withdrawn and a favorable action on the merits requested.

## **Conclusion**

Applicant respectfully submits that the objection and rejections have been overcome by the Amendment and Remark, and that the claims as amended are now in condition for allowance. Accordingly, Applicant respectfully requests the objection and rejections be withdrawn and the claims as amended be allowed.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request for an Extension of Time**

The Applicant respectfully petitions for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

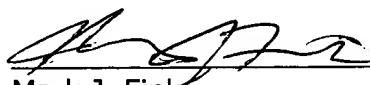
### **Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: April 16, 2001



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## **Version With Markings To Show Changes Made**

1. (Amended) An apparatus comprising:

an analog photocell adapted to capture light energy incident upon it as a series of [an] analog signals [signal];

a first sample-and-hold amplifier coupled to said photocell and adapted to store [said] a first analog signal of the series of analog signals;

a second sample-and-hold amplifier coupled to the first sample-and-hold amplifier and adapted to store the first analog signal when the first sample-and-hold amplifier stores a second analog signal of the series of analog signals;

a differential amplifier coupled to the first and second sample-and-hold amplifiers generating an analog difference of the first analog signal and the second analog signal;

a digital converter coupled to said differential amplifier said converter transforming the analog difference [said analog signal] into a digital value[, said value proportional to the amount of said light energy].

2. (Amended) An apparatus according to claim 1 wherein said digital converter includes:

a voltage controlled oscillator;

a counter coupled to said oscillator, said oscillator setting the rate of increase of said counter[, said rate proportional to said stored analog signal].